

**Michigan Department of Health and Human Services
Division of Environmental Health
Healthy Homes Section**

**Procedural Guidelines for Accommodating the Housing Needs of Families
with Lead Poisoned Children Undergoing Chelation Therapy**

The Michigan Department of Community Health has developed the following guidelines to accommodate families whose children are or have recently undergone chelation therapy (in-patient or out-patient) for lead poisoning. These guidelines cite state and federal requirements and provide suggested procedures to be employed that will allow for the hospital release of the treated child prior to the residential property receiving permanent lead hazard control work. The best solution is to relocate the child or family until permanent abatement measures can be employed on the property; however, this is not always feasible. This guideline was developed in recognition that a child is typically released from the hospital within days of being admitted, and the Environmental Investigation and lead hazard control processes take considerable time. This guideline supports the use of temporary interim control solutions by properly trained individuals after lead-based paint hazards have been identified in properties of children receiving chelation therapy for lead poisoning. This guideline outlines the minimum requirements for addressing the property and the associated training/certification that is needed.

INTERIM CONTROLS -- CONTRACTOR

Interim control activities (non-abatement lead hazard control activities) are temporary fixes that are regulated by Michigan's lead laws (MCL 333.5451-333.5477) and the EPA's Renovation, Repair and Painting Rule (40 CFR 745.80 Subpart E).

Interim controls are a set of measures designed to temporarily reduce human exposure, or likely exposure, to lead-based paint hazards including, but not limited to, specialized cleaning, coating lead hazards with house paint, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and resident education programs.

Interim controls are not permanent fixes such as replacing windows and doors, enclosing lead hazards behind siding or paneling, covering hazards with approved encapsulants, or replacing lead-contaminated soil.

Interim controls, per Michigan statute, can be performed by either a certified lead paint abatement company or employees of an agency/company that have been trained in lead-safe work practices. If the measures to be employed remain within the legal definition of interim control, or are defined within the EPA Renovation, Repair and Painting (RRP) Rule, the work may proceed without lead abatement certification of the contractor or

workers. At a minimum, all who perform the interim control work must have taken the HUD 8-hour Lead-Safe Work Practices course or have received the 8-hour EPA-approved Certified Renovator Training course. Training of additional workers by a certified RRP Renovator (tailgate training) is not permissible when treating housing with lead poisoned children.

If a rental property owner chooses to perform interim control activities personally or with staff, then the owner's business entity must be certified as a Renovation Firm, and anyone working on the lead repairs must be certified as an Abatement Worker (3-day training class) or Renovator (1-day training class). In addition, a certified Lead Abatement Supervisor must be present during set-up and cleaning activities. If the rental property owner uses a property management company or hires an outside company to perform the work, they also must be certified as explained above.

The EPA RRP Rule requirements are initiated when more than six square feet of painted surface per room or 20 square feet of exterior surface is disturbed. However, the optimal training qualifications would be a contractor that is certified as a lead abatement firm as well as an EPA RRP firm in accordance with the Michigan Lead Abatement Act (MCL 333.5451 – 54770) and EPA 40 CFR 645.85, respectively. Rental property owners that want to work on their own properties are held to these same state and federal standards.

INTERIM CONTROLS -- LOCATIONS

Interim controls can be done on the whole interior and exterior, but is not required. If, there are rooms that the child does not have regular access to, they can be sectioned off until lead hazard control work can be completed. Interim controls must be performed in the rooms that the child has access to.

Interior work can be restricted (per HUD Part 35 Relocation Standard) to the following areas at a minimum -- sleeping area of the lead poisoned child, cooking area, bathroom, play area, and at least one safe egress (e.g., front, side, or rear door). If this partial option is chosen, all floors in the whole home must be HEPA-vacuumed first. Room entrances of the restricted area need to be covered with vertical containment or other barrier (e.g., plastic sheeting, baby gate, plastic fencing, safety door knobs) that allows for ventilation, where needed but prevents child access to areas that will not have received interim control treatment.

Regarding exterior interim control work, at a minimum, it must be performed on the designated egress areas outlined with caution tape. The Environmental Investigator and the primary caregivers should work together to identify the restricted area most in need of treatment, also taking into account occupant use patterns, and where temporary barriers can be erected.

One suggestion for making a covered porch that has been designated as a safe egress temporarily safer, is for the floor to be HEPA vacuumed and covered with indoor/outdoor

matting and taped down to hold it securely in place. The mat(s) does not need to span the entire width of the covered porch, but should span the distance from the door threshold to the first porch step. This should be written into every Interim Control work specification for the contractor. Some type of barrier should then remain in place preventing occupants from accessing other areas of the porch that are potentially contaminated and tracking paint dust or chips into the living area of the home. All occupants should remove shoes prior to entering the contained area where the child is restricted to.

The partial Interim Controls described above are done with the understanding that containment remains intact until the home receives lead hazard control performed by a Michigan-certified lead abatement company.

EVIDENCE OF PICA BEHAVIOR

If there is evidence of pica behavior (i.e., x-ray reveals paint chips, caregiver observation, Environmental Investigation visual assessment), awareness and interim control actions need to be stepped up. The Environmental Investigator needs to make careful observations and notes during the visual assessment, especially of all window and door systems, trim work and other chewable surfaces. The lead investigation report also needs to reflect this priority in the recommendations. Case management staff should alert caregivers to this special circumstance through one-on-one education and hands-on demonstration. Caregivers should take on the extra responsibility of ensuring lead-safe behaviors of the child and other occupants for the child. The Interim Control contractors should treat all chewable and/or chewed surfaces with at least one of the following: a bittering agent (e.g., Bitrex, Sour Apple), paint, or physical barrier. The intention is to prevent the child from continuing to chew on lead painted surfaces. In these circumstances, consultation with an experienced lead professional is strongly recommended for inclusion of prevention techniques that can be used until lead hazard control work is performed. Re-application of prevention techniques may be necessary depending on the method chosen, the length of time before work begins, and the behavior of the child.

OCCUPANT PARTICIPATION PLAN

We strongly recommend a document accompany this process which serves as a plan for parental/caregiver involvement and accountability in caring for the EBL child upon return from the hospital. This plan should include a floor plan of the treated area that is developed with the primary caregiver. Additionally, the plan should include a regular schedule of lead dust control by the occupant to include HEPA vacuuming and family education. The plan should also explicitly state that the child must only occupy the treated area and that other occupants should minimize tracking of lead dust by reducing the frequency of accessing untreated areas. Caretaker(s), EBL Environmental Investigator and the public health nurse should sign the plan to solidify the understanding of the process and actions that will be taken and by whom. These interim control

procedures will only work with the full cooperation of the child's caregivers. If evidence suggests that caregivers will not or cannot comply with this plan, then alternate lead-safe housing may be the only safe solution.

CLEARANCE REPORT

A Clearance Report is required for Interim Controls, which includes a visual assessment of the property. A minimum of 4 rooms or room equivalents needs to be sampled, which must include the sleeping area of the lead poisoned child. A floor is sampled in each room, alternating between the testing of a window sill and window trough with each floor. The Clearance will only pertain to the contained/restricted area. If containment is present, one floor sample should be pulled from outside of the containment area to ensure that the immediate entrance outside of the containment will not pose a track-in hazard. The need for daily cleaning of the contained area and the entrance to the contained area is critical to the success of this temporary procedure.

Regarding the exterior and Clearance, only a visual of the designated egress locations needs to be assessed. Caution tape or barriers that restrict, set up by the Interim Control contractor, should remain intact until the visual assessment is made and the EBL Environmental Investigator determines the area cleared.

FAILED CLEARANCE

If one or more dust wipes fails, the contractor must re-clean the area. The area should be re-tested. If the dust wipe from the area fails a second time, the contractor performing interim controls should consult with a certified abatement company, if not being employed, for further steps toward achieving clearance. If a certified abatement firm is being used and clearance cannot be obtained after repeated interim control measures, then the child should not be allowed to live at the residence until full lead hazard control treatment is completed.

OTHER CONSIDERATIONS

A case manager should make periodic follow-up visits to the home to: ensure that containment is still intact; ensure that a regular schedule of lead dust cleaning is being followed; and ensure that caregivers are protecting the child from further lead exposure. The Occupant Participation Plan should also be reviewed to ensure that all action items are being carried out.